

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 4:19-CR-00716
)	
Plaintiff,)	JUDGE PAMELA A. BARKER
)	
v.)	
)	
REUBEN RANKIN,)	<u>MOTION FOR PROTECTIVE ORDER</u>
)	
Defendant.)	

Now comes the United States of America, by and through its counsel, Justin E. Herdman, United States Attorney, and Ranya Elzein, Assistant United States Attorney, and hereby respectfully requests that this Court issue the attached Stipulated Protective Order pertaining to discovery in the above-captioned case pursuant to Federal Rule of Criminal Procedure 16(d)(1) and 18 U.S.C. § 3509(d).

Federal Rule of Criminal Procedure 16(d)(1) provides that “the court may, for good cause, deny, restrict, or defer discovery or inspection, or grant other appropriate relief.” Fed. R. Crim. P. 16(d)(1). The Child Victims’ and Child Witnesses’ Rights Act requires that certain measures be taken to protect a minor’s privacy, including restricting the dissemination of a minor’s personal identifying information and documents containing the same. *See* 18 U.S.C. §§ 3509(d)(1)–(2). To satisfy that requirement, the Act permits courts to issue an order protecting a minor from public disclosure of such information. 18 U.S.C. § 3509(d)(3).

Here, Defendant is indicted with one count of Sex Trafficking of a Minor, in violation of 18 U.S.C. § 1591(a), and one count of Production of Child Pornography, in violation of 18

U.S.C. § 2251. The material that the government intends to provide in discovery contains personal identifying information of minor victims and witnesses, including but not limited to names, addresses, telephone numbers, and photographs.

Accordingly, in the interest of protecting the privacy rights of the alleged minor victims and witnesses, the government respectfully requests that the Court issue the attached Stipulated Protective Order pursuant to Federal Rule of Criminal Procedure 16(d)(1) and 18 U.S.C. § 3509(d).

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

By: /s/ Ranya Elzein
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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of January 2020, copies of the foregoing document and accompanying proposed order were filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Ranya Elzein

Ranya Elzein
Assistant U.S. Attorney